



June 11, 2014

Ms. Samantha Urquhart-Foster
Superfund Remedial and Site Evaluation Branch
U.S. Environmental Protection Agency
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960
Urquhart-Foster.Samantha@epa.gov

**Subject: Supplement to Vapor Intrusion Assessment Work Plan (Revision 4)
CTS of Asheville, Inc. Superfund Site
235 Mills Gap Road, Asheville, Buncombe County, North Carolina
EPA ID: NCD003149556
CERCLA Docket No. CERCLA-04-2012-3762
AMEC Project 6252-12-0006**

Dear Ms. Urquhart-Foster:

AMEC Environment & Infrastructure, Inc. (AMEC) has prepared this Supplement to Vapor Intrusion Assessment Work Plan (Revision 4) for the above-referenced site on behalf of CTS Corporation. The Vapor Intrusion Assessment is being implemented pursuant to the requirement set forth in Section 1.3.4 of the Scope of Work contained in Appendix A of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study between the United States Environmental Protection Agency (USEPA) Region 4 and CTS Corporation (effective date of January 26, 2012).

In response to USEPA's email to Jones Day dated June 6, 2014, CTS Corporation agrees to perform air sampling at properties adjacent to, or near, the springs area located east of the site. The proposed air sampling locations were selected based on the results of USEPA ambient/crawlspace sampling in 2007 and 2008, and in consideration of the April 2014 air sampling results. Air samples will be collected at the locations depicted in the attached figure and tabulated in Table 1 below.

CTS Corporation is prepared to conduct the sampling and receive validated results within the two-week time period proposed by USEPA, beginning on June 23, 2014, pending USEPA obtaining access to the properties. If approval of the proposed locations is received from USEPA by June 12, 2014, the laboratory can provide individually-certified Summa canisters early in the week of June 23, 2014. The sampling activities will be conducted in two days, and the canisters will be shipped via overnight delivery to ALS Environmental in California for analysis. The ambient and crawlspace samples will be analyzed for four site-specific VOCs according to Method TO-15 SIM. The indoor air samples will be held by the laboratory, pending receipt of the preliminary analytical results of the crawlspace and ambient air samples. ALS has indicated that they can provide preliminary analytical results within 48 hours of receipt of the samples, with a Level IV data package to follow in two days. Data validation of the Level IV data package will be

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performed within two days following receipt of the data package. In summary, the sampling activities can be performed and validated analytical results can be received by July 7, 2014 (two weeks from June 23, 2014).

Table 1: Proposed Air Sampling Locations

Sample Type	Address	Owner	Comment	
Ambient	(b)(6)	(b)(6)		
Ambient	15 Busbee Knoll	Buncombe County	2008 ambient samples were non-detect for TCE	
Crawlspace/Indoor*	(b)(6)	(b)(6)		
Ambient	(b)(6)	(b)(6)		
Crawlspace/Indoor*	(b)(6)			
Crawlspace/Indoor*				
Ambient				(b)(6)
Crawlspace/Indoor*				
Ambient				
Crawlspace/Indoor*				
Ambient				
Ambient				
Ambient				
Ambient				
Ambient				
(b)(6)	will also be collected at the locations where crawlspace and ambient air samples are collected. The indoor air samples will be held by the laboratory, pending receipt of the preliminary analytical results of the crawlspace and ambient air samples.			

If you have questions regarding this information, please contact us at (828) 252-8130.

Sincerely,

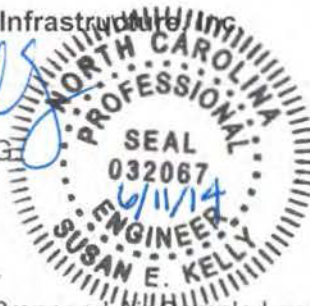
AMEC Environment & Infrastructure, Inc.


 Susan E. Kelly, P.E., L.G.
 Senior Engineer

SEK/MEW:sek

attachment: Figure 1 – Proposed Air Sample Locations

cc: Robert Patton, CTS Corporation
 Michael Dolan, Jones Day
 Nile Testerman, NCDENR




 Matthew E. Wallace, P.E.
 Principal Engineer

